

MEMORANDUM

TO: Richard Haynes, Engineer
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FROM: Billy Britton, Hydrologist *Billy Britton*
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DATE: April 3, 1992

RE: Draft Remedial Design and Remedial Action: Field Sampling
and Analysis Plan and Health and Safety Plan
Medley Farm NPL Site
SCD 980 558 142
Cherokee County

The referenced documents have been reviewed, as requested. In general, the documents appear acceptable. However, in addition to the work proposed in the Field Sampling and Analysis Plan, more work appears necessary to address some concerns previously expressed by the Department in a memorandum dated May 1, 1991.

- 1) As stated in previous comments from the Department regarding the Draft Record of Decision (ROD), the extent of contamination in the saprolite northeast of well SW-108, in the bedrock northeast of BW-108, and in the bedrock southwest of wells BW-105, BW-109, and BW-106 was not adequately defined during the remedial investigation. The Department's previous comments suggested that additional wells should be installed in the above-mentioned areas and samples should be collected to confirm the extent of contamination and to ensure adequate design of the groundwater recovery system. While useful information regarding the extent of contamination to the north and northwest of wells SW-3 and SW-108 may be obtained during the proposed groundwater screening survey and by the installation of the currently proposed monitoring wells, the Department believes that the proposed work will not be sufficient to adequately define the extent of contamination in the above-mentioned areas. Therefore, more work, in addition to the proposed work, appears necessary.
- 2) The Department also previously has requested that additional samples be collected to resolve the issue of



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whether semi-volatile organic compounds (SVOCs) are present in groundwater at the site. It is noted that samples which will be collected from proposed monitoring well pairs BW-201/SW-201 and BW-202/SW-202 will be analyzed for both Target Compound List (TCL) volatile organic compounds (VOCs) and TCL SVOCs. However, due to the proposed placement of monitoring wells BW-201/SW-201 and BW-202/SW-202, it is doubtful that sampling these wells would yield data which could determine, conclusively, whether or not SVOCs are present in groundwater at the site. To resolve this issue, the Department recommends that, at a minimum, one round of samples be collected and analyzed for SVOCs from all of the wells in which contamination has been detected during the remedial investigation. This additional sampling is important, because the selected treatment option for groundwater at the site is air stripping, and air stripping alone may not be effective in dealing with SVOCs that may potentially be present.

- 3) According to the Field Sampling and Analysis Plan, "Direct Push Technology" will be used in the groundwater screening efforts. In the event that "Direct Push Technology" can not penetrate the soils at the site to the desired depth, does any contingency plan exist?